

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

RON L. LACKS, PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
HENRIETTA LACKS,

Plaintiff,

v.

ULTRAGENYX PHARMACEUTICAL, INC.,

Defendant.

Case No. 1:23-cv-02171-DLB

**JOINT STATUS REPORT**

The Fourth Circuit having denied the petition for mandamus of Defendant Ultragenyx Pharmaceutical, Inc. (Case No. 25-1240) and pursuant to this Court's direction, the Parties hereby provide a status report addressing topics in response to the Court's Letter Order dated March 3, 2025. Having met and conferred regarding these topics, below are the parties' positions.

**1. Any changes to the dates in the proposed scheduling order.**

The Parties agree that fact discovery should begin upon the Court's entry of the scheduling order, and should run for 7.5 months or 230 days from that date, as follows<sup>1</sup>:

<b>Day</b>	<b>Event/Deadline</b>
Zero	Discovery begins
30	Moving for joinder of additional parties or amendment of pleadings
30	Deadline to file protective order and ESI protocol or letters per Court's individual rules outlining areas of dispute
120	Deadline for substantial completion
165	Deadline for Plaintiff to serve Parties' Rule 26(a)(2) disclosures together with any expert reports.

<sup>1</sup> Any deadline falling on a Saturday, Sunday, or legal holiday will be moved to the next day that is not a Saturday, Sunday, or legal holiday, in accordance with Fed. R. Civ. P. 6(a)(1)(C).

195	Deadline for Defendant to serve Parties' Rule 26(a)(2) disclosures together with any expert reports.
225	Deadline for Plaintiff to serve any reply/rebuttal Rule 26(a)(2) disclosures together with any expert reports.
230	Any expert depositions complete.
230	Close of fact discovery deadline, submission of status report
237	Requests for Admission
250	Dispositive pretrial motions
250	Deadline to file any <i>Daubert</i> motions.

a. Expert Discovery:

The Parties agree that expert discovery should take place during the above time period, commencing 45-days after the substantial completion deadline, as detailed above.

**2. Any changes to the proposed number of deposition hours.**

The Parties agree that they should have 30-hours of deposition time to accommodate the complexity of the issues at hand.

**3. Whether the parties would like to defer expert testimony until after summary judgment motions are resolved.**

The Parties agree that expert discovery should occur prior to summary judgment motions as set forth in Section 1 above.

**4. Whether discovery of electronically stored information may be necessary.**

The Parties agree that discovery of electronically stored information will be necessary and will abide by any ESI protocol entered by the Court and the Principles for Discovery of Electronically Stored Information in Civil Cases, available at <https://www.mdd.uscourts.gov/sites/mdd/files/ESI-Principles.pdf>.

**5. Whether the parties would like to participate in a settlement conference before or on completion of discovery.**

The Parties do not believe that a settlement conference would be productive at this time, as the Parties have already participated in two settlement conferences with no resulting settlement. The Parties are open to an additional settlement conference after meaningful discovery has occurred.

**6. Whether there is unanimous consent to proceed before a U.S. Magistrate Judge for all proceedings.**

The Parties do not unanimously consent to proceed before a U.S. Magistrate Judge for all proceedings.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served this 13<sup>th</sup> day of May, 2025, on all counsel of record via the court's ecf filing system.

/s/ Kim Parker

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Kim Parker, Esquire